John P. Barry

Proskauer Rose LLP

One Newark Center

Newark, NJ 07102

Tel: (973) 274-6081 Fax: (973) 274-3299

jbarry@proskauer.com

Richard M. Goldstein *

Baldassare Vinti *

Proskauer Rose LLP

11 Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

* Pro Hac Vice application to be filed

Attorneys for Defendant Church & Dwight Co., Inc.

RECEIVED

AT 8:30 WILLIAM T. WALSH CLERK

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SA	W	'HO	RSI	EEN	ITER	RPR	ISE:	S, IN	C.,

Plaintiff,

-against-

CHURCH & DWIGHT, INC.,

Defendant.

Civ. No. 3:12-CV-06811 (FLW) (TJB)

Motion Date: March 4, 2013

Document Electronically Filed

PROPOSEDLORDER TO SEAL

THIS MATTER having been brought before the Court by Proskauer Rose LLP, attorneys for Church & Dwight Co., Inc. ("Church & Dwight") by way of a motion to seal a portion of the record pursuant to Local Civil Rule 5.3 and the Court having considered the Church & Wright and no apposition having been filed, written submissions of counsel in support thereof, and the Court having found that:

- 1. As part of its papers filed in opposition to Plaintiff Sawhorse Enterprise's Motion for Expedited Discovery, Church & Dwight filed the Declaration of John P. Barry attaching exhibits containing some information that the parties consider to be confidential.
 - 2. Church & Dwight also filed "Church & Dwight's Memorandum of Law in

Opposition to Plaintiff's Motion for Expedited Discovery."

- 3. Church & Dwight believes that if certain of these materials are not kept confidential, Church & Dwight will suffer a clearly defined, serious, and significant injury.

 Thus, in Church & Dwight's opinion, it has legitimate private business interests in keeping these materials from public disclosure, such interests warranting the relief sought.
- 4. Further, Plaintiff has requested that certain of the information in "Church & Dwight's Memorandum of Law in Opposition to Plaintiff's Motion for Expedited Discovery" be kept confidential, due to its sensitive nature.
- 5. The relief sought restricts access only to those materials that the parties consider to be confidential, the least restrictive available option that will protect the confidentiality of those materials.

THEREFORE, for good cause shown,

IT IS upon this 26 day of Lebruary, 2013,

ORDERED that Church & Dwight's motion to seal is hereby granted, and the confidential portions of the Declaration of John P. Barry in Support of Church & Dwight's Opposition to Plaintiff's Motion for Expedited Discovery shall be sealed and excluded from the public record, and "Church & Dwight's Memorandum of Law in Opposition to Plaintiff's Motion for Expedited Discovery" shall also be sealed and excluded from the public record.

It is youther PROERED that the Honorable Tonianne J. Bongiovanni, U.S.M.J. Clurk of the Court terminate the apprenentianed motion [blocket Endry No. 31] accordingly.

The Court is aware that any interested person has until March 4,2013 to more to intervene with respect to this motion to seal. This Order in mo way prejudices that right. Should an interested person timely more to intervene, the Court shall reexamine its yendings at that time.